

1 **LAW OFFICES OF DALE K. GALIPO**

2 Dale K. Galipo (SBN 144074)

3 dalekgalipo@yahoo.com

4 Benjamin S. Levine (SBN 342060)

5 blevine@galipolaw.com

6 21800 Burbank Blvd., Ste. 310

7 Woodland Hills, CA 91367

8 Tel: (818) 347-3333

9 Fax: (818) 347-4118

10 *Attorneys for Plaintiff V.L.*

11 Garo Mardirossian (SBN 101812)

12 garo@garolaw.com

13 Lawrence D. Marks (SBN 153460)

14 Lmarks@garolaw.com

15 **MARDIROSSIAN AKARAGIAN, LLP**

16 6311 Wilshire Blvd.

17 Los Angeles, CA 90048

18 Tel: (323) 653-6311

19 Fax: (323) 651-5511

20 *Attorneys for Plaintiffs S.L. and CAROLYN CAMPBELL*

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 S.L., a minor by and through the
24 Guardian Ad Litem Kristine Llamas
25 Leyva, individually and as successor-in-
26 interest to JOHNNY RAY LLAMAS,
deceased; V.L., by and through the
Guardian Ad Litem Amber Snetsinger,
individually and as successor-in-interest
to JOHNNY RAY LLAMAS, deceased;
and CAROLYN CAMPBELL,
individually,

27 Plaintiffs,

28 v.

COUNTY OF RIVERSIDE; SHAWN
HUBACHEK; JIMMIE MCGUIRE; and
DOES 3-10, inclusive,

Defendants.

Case No. 5:24-cv-00249-CAS-SP

Hon. Christina A. Snyder

**STIPULATION AND JOINT
REQUEST FOR ORDER
CONTINUING PRETRIAL
DEADLINES AND HEARINGS**

*[Proposed Order filed concurrently
herewith]*

1 **TO THE HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs V.L., S.L.,
3 and Carolyn Campbell, and Defendants County of Riverside, Shawn Hubachek, and
4 Jimmie McGuire—the parties to this action—for the purpose of jointly requesting
5 that the honorable Court enter an order, pursuant to Fed. R. Civ. P. 16(b)(4) and any
6 applicable Orders of the Court, briefly continuing the applicable pretrial filing
7 deadlines, cutoffs, and hearings, as follows:

8 **GOOD CAUSE STATEMENT**

- 9 1. This is a wrongful death and survival civil rights action involving the
10 Riverside County Sheriff's Department. Plaintiffs' original complaint was
11 filed against the County of Riverside and Doe defendants on February 1,
12 2024. [Dkt. 1.] After that Complaint was filed, a First Amended Complaint
13 was filed on September 27, 2024, naming Shawn Hubachek and Jimmie
14 McGuire as additional defendants. [Dkt. 34] All named defendants
15 subsequently answered the First Amended Complaint. [Dkt. 39.]
- 16 2. The Court issued an Order setting pretrial dates and deadlines in this action on
17 June 3, 2024. [Dkt. 27.] Those dates and deadlines include, in relevant part:
 - 18 a. A Settlement Completion Cutoff of August 6, 2025;
 - 19 b. A deadline to file Motions *in Limine* of August 11, 2025 (28 days
20 before Final Pretrial Conference);
 - 21 c. A Status Conference re: Settlement on August 18, 2025, at 11:00 a.m.;
22 and
 - 23 d. A Final Pretrial Conference and Hearing on Motions *in Limine* on
24 September 8, 2025, at 11:00 a.m. [*Id.*]

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- 1 3. This Court's Local Rules impose additional pretrial filing deadlines. These
- 2 include, in relevant part:
 - 3 a. Deadlines to file Memoranda of Contentions of Fact and Law, Witness
 - 4 Lists, and a Joint Exhibit list of August 18, 2025 (21 days before Final
 - 5 Pretrial Conference) [L.R. 16-4, 16-5, 16-6.1; Dkt. 27]; and
 - 6 b. A deadline to file a Proposed Final Pretrial Order, including objections
 - 7 to exhibits, on August 28, 2025 (11 days before Final Pretrial
 - 8 Conference) [L.R. 16-6.3, 16-7].
- 9 4. A Jury Trial is currently scheduled to begin in this action on October 7, 2025.
- 10 [Dkt. 27.]
- 11 5. The parties intend to attempt in good faith to resolve this action prior to trial.
- 12 Accordingly, and in light of the Settlement Completion Cutoff imposed by the
- 13 Court, counsel contacted the Court's assigned panel mediator for this case,
- 14 Richard T. Copeland, on May 22, 2025, to schedule a mediation. Due to the
- 15 mediator's and counsel's availability, the earliest date when counsel, the
- 16 mediator, and other necessary attendees could hold a mediation was
- 17 September 10, 2025. Accordingly, the parties have booked and plan to attend
- 18 a mediation with Mr. Copeland on September 10, 2025. Regrettably, and
- 19 despite counsel's best efforts, this date is after the current Settlement
- 20 Completion Cutoff of August 6, 2025, and the Status Conference re:
- 21 Settlement, currently scheduled for August 18, 2025, at 11:00 a.m. [Dkt. 27.]
- 22 6. On May 16, 2025, Defendants filed a Motion for Summary Judgment in this
- 23 matter. [Dkt. 43.] Following briefing and oral argument, on June 23, 2025, the
- 24 Court issued an order granting in part and denying in part the motion. [Dkt.
- 25 54.] On July 18, 2025, Defendants filed a Notice of Appeal regarding the
- 26 denial in part of the motion. [Dkt. 55.] Counsel are currently engaged in meet-
- 27 and-confer efforts regarding a potential motion to stay proceedings in this
- 28 Court pending the outcome of Defendants' appeal.

1 7. In order to allow the parties to participate in the scheduled mediation and
2 endeavor to resolve this action prior to trial, without the parties first having to
3 prepare and submit the above-mentioned pretrial documents to the Court or
4 litigate a motion to stay the action, the parties are respectfully requesting that
5 the Court continue the deadlines governing the submission of the above-
6 mentioned pretrial documents and hearing dates by a short period only, while
7 maintaining the current trial date, as set forth below.
8 8. This is the first request by the parties for a continuance of any dates or
9 deadlines in this matter.

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1 **STIPULATION RE: CONTINUANCE OF SCHEDULING ORDER AND**
2 **LOCAL RULES DEADLINES**

3 9. Accordingly, in light of the foregoing Good Cause, the parties hereby
4 stipulate and request an order continuing the above-mentioned filing
5 deadlines and hearing dates as follows:

EVENT	CURRENT DEADLINE	REQUESTED DEADLINE
Settlement Completion Cutoff	08/06/2025	09/12/2025
Deadline to File Motions <i>in Limine</i>	08/11/2025	09/12/2025
Status Conference re: Settlement	08/18/2025 11:00 a.m.	09/15/2025 11:00 a.m.
Deadline to File Memoranda of Contentions of Fact and Law, Witness List, Joint Exhibit List	08/18/2025	09/12/2025
Deadline to File Proposed Final Pretrial Order (with Objections to Exhibits)	08/28/2025	09/15/2025
Deadline to File Oppositions to Motions <i>in Limine</i>	(None Set)	09/19/2025
Final Pretrial Conference and Hearing on Motions <i>in Limine</i>	09/08/2025 11:00 a.m.	09/22/2025 11:00 a.m.

24 10. The parties are not currently requesting a continuance of any other dates or
25 deadlines set by the Court in this case and the parties understand that all other
26 dates and deadlines, including the trial date, shall remain unchanged and
27 unaffected by the parties' stipulation and by the Order requested by the
28 parties.

1 IT IS SO STIPULATED.

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3 DATED: August 4, 2025 LAW OFFICES OF DALE K. GALIPO

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5 By: /s/ Benjamin S. Levine
6 Dale K. Galipo
7 Benjamin S. Levine¹
8 Attorneys for Plaintiff V.L.

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10 DATED: August 4, 2025 MARDIROSSIAN AKARAGIAN, LLP

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12 By: /s/ Lawrence D. Marks
13 Garo Mardirossian
14 Lawrence D. Marks
15 Attorneys for Plaintiffs S.L. and
16 Carolyn Campbell

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18 DATED: August 4, 2025 MANNING & KASS
19 ELLROD, RAMIREZ, TRESTER LLP

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21 By: /s/ Kayleigh Andersen
22 Eugene P. Ramirez
23 Lynn L. Carpenter
24 Kayleigh Andersen
25 Attorneys for Defendants

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¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.